

## "BILL OF COMPLAINT"

Alta O. Gardner and Frank A.  
Gardner, her husband

"  
"

No. 17830 Equity.

Vs.

"

In the Circuit Court

Richard R. Gardner, infant

"  
"

for Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Alta O. Gardner and Frank A. Gardner, her husband, respectfully represents unto your Honorable Court:

FIRST: That on the 4th day of February, 1954, a certain Roy I. Hyndman, unmarried, conveyed a certain tract or parcel of land unto Alta O. Gardner, Frank A. Gardner, her husband, and Richard R. Gardner, as joint tenants, said deed being recorded in Liber No. 527, folio 74, one of the Land Records for Frederick County, certified copy of which is filed herewith marked Exhibit No. 1 to this Bill of Complaint.

SECOND: That the said Richard R. Gardner is nineteen years of age.

THIRD: That the real estate mentioned in said deed amounts to 126 acres and 26 square perches of land, more or less, and being the same real estate which was conveyed unto Roy I. Hyndman by deed from Alta O. Gardner and Frank A. Gardner, her husband, dated the 4th day of February, 1954, and recorded in Liber No. 527, folio 73, one of the Land Records for Frederick County.

FOURTH: That on the 17th day of April, 1954, your Petitioners, Alta O. Gardner and Frank A. Gardner, her husband, together with Richard R. Gardner and Edith A. Gardner, his wife, entered into a contract and agreement with Bruce M. Ellsworth and Audrey B. Ellsworth, his wife, for the sale of part of the above mentioned real estate, said part being all that real estate situate, lying and being in Woodville District, Frederick County, Maryland, and beginning for a description of the same at a point in the County Road leading from the Baltimore-Frederick Turnpike and passing Woodville where an iron pipe is planted in said road, and running thence (1) N. 77° 15' W. 204.8 feet to another iron pipe, thence (2) N. 6° 42' W. 143 feet to an iron pipe, (3) S. 74° 35' E. 211.3 feet to the county road where an iron pipe is planted, (4) N. 4° 30' E. 152.6 feet along said road to the point of beginning, containing .74 acre, at and for the sum